



September 28, 2017

**SUBMITTED ELECTRONICALLY VIA ECFS**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Washington, DC 20554

**Re: WT Docket No. 17-200  
Ex Parte Letter**

Dear Ms. Dortch:

Victory Propane, LLC ("Victory") is a business enterprise entity that qualifies as a Critical Infrastructure Industry ("CII") under the FCC rules with a significant and immediate interest in the proceeding referenced above. Victory commends the Commission for taking this first step toward creating a broadband opportunity designed to address the specific needs of business CII users whose requirements are not always met on commercial broadband networks.

The FCC is leading the nation in its recognition that broadband is a catalyst that will fuel job creation and economic growth. It is essential in enabling American businesses to compete effectively around the world. Our company already uses commercial broadband networks to address some needs, but networks designed primarily for consumer use do not always offer the coverage, security, reliability, redundancy, priority access, or control functions needed for certain operations. For example, we run voice communications on commercial networks but are not able to rely on them for applications such as remote tank reading. A business-focused broadband option below 1 GHz will allow us to address those needs on spectrum that offers meaningful cost savings. Operations like ours can need extensive coverage, often in less densely populated areas, so minimizing the infrastructure cost goes directly to the bottom line.

We recognize that creating a private enterprise broadband allocation at 900 MHz will require some incumbents to relocate their systems to different 900 MHz channels. Although Victory is not currently one of those incumbents, we will need to decide whether to deploy and maintain an LMR system in some form or move entirely to broadband. Reconfiguring a system always involves some disruption but, in our opinion, the gain for all business CII entities in having access to a broadband option in this band more than outweighs those inconveniences.

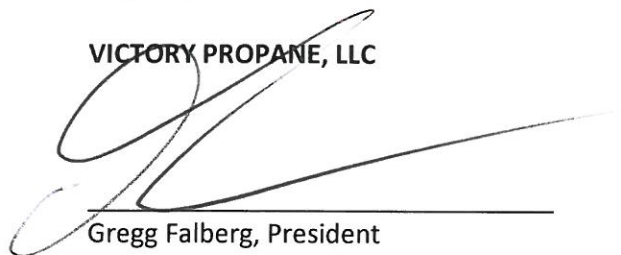
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224-326-2224 (fax)



Victory Propane, LLC hopes the FCC intends to move quickly to the next step in creating a 900 MHz broadband allocation for business CII users and looks forward to participating actively in this proceeding.

Regards,

**VICTORY PROPANE, LLC**

  
Gregg Falberg, President

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